

# EXHIBIT 4

SCOTT D. BONORA  
LOANDEPOT.COM, LLC V. CROSSCOUNTRY

May 22, 2023

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

LOANDEPOT.COM, LLC, )  
)  
Plaintiff, ) Case No.  
) 1:22-cv-05971-LGS  
vs. )  
)  
CROSSCOUNTRY MORTGAGE, LLC, )  
STANISLAV ALESHIN, KEISHA )  
ANTOINE, ANTHONY AYALA, SCOTT )  
BONORA, FAHEEM HOSSAIN, )  
STUART KOLINSKY, BARRY KOVEN, )  
DANIEL KWIATKOWSKI, JAROSLAW )  
KWIATKOWSKI, YUSHENG LIU, )  
ROBERT LONDON, ENRICO )  
MARTINO, DANIEL MEIDAN, SCOTT )  
NADLER, GIOVANNI NARVAEZ, )  
DAVID OSTROWSKY, EMELINE )  
RAMOS, ROBERT RAUSH, RAFAEL )  
REYES, MICHAEL SECOR, )  
LLEWELLYN TEJADA, ILYA )  
VAYSBERG, ERIKA VIGNOLA, and )  
YAN ZHENG, )  
)  
Defendants )  
-----)

DEPOSITION OF SCOTT D. BONORA

May 22, 2023

9:21 a.m.

900 Third Avenue

New York, New York

KRISTIN KOCH, RPR, RMR, CRR

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1 S. Bonora

2 Q. You needed one. Okay.

3 A. Yes.

4 (Bonora Exhibit 2, e-mail dated  
5 3-3-2022 with attachment, Bates stamped  
6 INDIVDEF\_0010870 through INDIVDEF\_0010883,  
7 marked for identification.)

8 Q. All right. Let's look at Bonora 2,  
9 which is -- let me put it into the chat. It is a  
10 document Bates stamped Individual Defendant  
11 0010870 from Scott Bonora's Gmail address to an  
12 e-mail address playersonlycommish@gmail.com, March  
13 3rd, 2022.

14 And you write: "Here is the old one  
15 and the new one. I have not signed the new one,  
16 but most of the guys have. Barry and Tony have,  
17 Raf has not."

18 Is "Barry" Barry Koven in this e-mail?

19 A. Yes.

20 Q. Is "Tony" Tony Ayala?

21 A. Yes.

22 Q. Is "Raf" Rafael Reyes?

23 A. Correct.

24 Q. And who is  
25 playersonlycommish@gmail.com?

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1 S. Bonora

2 A. I think that's Justin Lieberman.

3 Q. Okay. And it look like there is an  
4 attachment, Retail Master Incentive Plan, and it  
5 says "prior" in handwritten -- in a handwritten  
6 note on the top. Did you write that, "prior"?

7 A. Yes.

8 Q. Okay. What is this document?

9 A. This is the Retail Master Incentive  
10 Plan for loanDepot.

11 Q. Okay. And if you scroll down to page 5  
12 of the PDF, do you see that Section VI says  
13 "Employee Confidentiality, Company Property, and  
14 Non-Solicitation Obligations"?

15 A. Yes.

16 Q. All right. Have you reviewed these  
17 provisions in the past?

18 A. Yes.

19 Q. Okay. And is that your signature on  
20 page 8 of the PDF, 7 of the attachment?

21 A. Electronic signature, yes.

22 Q. Okay. But you did cause that  
23 electronic signature to appear, right, just for  
24 the record?

25 A. I believe so, yes.

1 S. Bonora

2 doesn't think.

3 Q. All right. So in 2018, the Guaranteed  
4 Rate, CrossCountry, GuardHill Financial, FM Home  
5 Loans, you thought that they offered more  
6 competitive pricing than loanDepot?

7 A. I didn't think that. I was exploring  
8 that.

9 Q. Okay. Did you speak with anyone at  
10 CrossCountry about joining CrossCountry in 2018?

11 A. Yes.

12 Q. Who did you speak with about that in  
13 2018?

14 A. Justin Lieberman.

15 Q. Anybody else?

16 A. Ron Leonhardt. Some of their corporate  
17 executives, I'm sure. I don't recall who.

18 Q. Did you decide not to join CrossCountry  
19 in 2018?

20 A. Correct.

21 Q. Were any of your loan officers thinking  
22 about joining CrossCountry in 2018?

23 A. I don't know.

24 Q. Did you speak with anyone at loanDepot  
25 about your own personal interest in joining